B No. 0625-0036 U.S. DEPARTMENT OF COMMERCE INTERNATIONAL TRADE ADMINISTRATION THIS SPACE FOR ITA USE FORM ITA-621P (REV 12-83) 872077 REPORT OF REQUEST FOR RESTRICTIVE TRADE PRACTICE OR BOYCOTT SINGLE TRANSACTION (For reporting requests described in Part 369 of the Export Administration Regulations) Pursuant to section 4A (b) (2) of the Export Administration Act of 1969, as amended (50 Puls.C. App. 2401 et sep.), information regarding the quantity, description, and value of any articles, materials and supplies, including technical data and other information, to which this report relates will be kept confidential when the reporting person certifies that disclosure would place a United States person involved at a competitive disadvantage, unless the Secretary of Commerce determines that disclosure thereof would not place such United States person at a competitive disadvantage or that it would be contrary to the national interest to withhold the information SUBSET [17 27 CLASS L FILING L TAG L 70 80 This report is required by law (50 U.S.C. App. §2407 (b) (2) P.L. 96-72; E.O. 12214; 15 C.F.R. Part (369). Failure to report can result both in criminal penalties, including fines or imprisonment, and administrative sanctions INSTRUCTIONS: Complete all items that apply. Assemble original report form and accompanying document(s) as a unit, and submit intact and unaltered. Assemble and submit a duplicate copy of report form and documents, marked with the legend "PUBLIC INSPECTION COPY." If the reporting firm certifies that disclosure of certain information specified in Item 10 below would result in competitive disadvantage, the public inspection copy (report form and accompanying documents) must be edited accordingly. 1a.Identify firm நூழ்க்கு இத்தொரைக்க, Inc. Name: Ronningen-Petter Division 1b. Check any applicable box: Specify firm type: Exporter ☐ Revision of a previous report (attach two copies of the Address: 9151 Shaver Road ☐ Bank previously submitted report) City, State and ZIP: Portage, MI 49024 ☐ Forwarder ☐ Resubmission of a deficient report returned by BTR (attach Country (if other than USA): form letter that was returned with deficient report) ☐ Carrier Telephone: 616/323-1313 □ Insurer □ Report on behalf of the person identified in Item 2 □ Dual report on behalf of self and the person identified in Item 2 Firm Identification No. (if known): ↑ Other 3. Identify exporting firm, unless same as Item 1a or 2: 2. If you are authorized to report and are reporting on behalf of another U.S. person, identify that person (e.g., domestic subsidiary, controlled foreign subsidiary, exporter, beneficiary): JGC (UBA) Inc. n/a Name: Name: Address: 10370 Richmond Avenue, Suite 800 Address City, State and ZIP: Houston, TX 77042 City, State and ZIP: Country (if other than U.S.A.): Country (if other than U.S.A.): 344245 Firm Identification No. (if known): Type of firm: (see list in Item 1a) Firm Identification No. (if known): (a) Name of boycotting country from which request originated: Name of country or countries against which request is directed Japan India / Israel (b) Name of country directing inclusion of request, if different from (a) above:

Pakistan 43-44 6. Reporting firm's reference number (e.g., letter of credit, customer order, 7. Date firm received request: (use digits for month/day/year) invoice): 0-0800-P-215A-102A 03/13/98 47-52 8. Specify type(s) of document conveying the request: Submit two copies of each ☐ Letter of credit Request to carrier for blacklist certificate (submit two copies of blacklist certificate or transcript of request) ☐ Requisition/purchase order/accepted contract/shipping instruction document or relevant age in which the

	Unwritten, not otherwise provided for (make transcript of request and submit two copies) 53-54	☐ Questionnaire ((not related to a particular dollar value transaction) (specify) Vendor Clarification	page in which th request appears
	Decision on request: (Check one)			
	χ Have not taken and will not take the action requested. (See	attached)	Have taken or will take the action requested but in a modiform (attach detailed explanation).	ified
	☐ Have taken or will take the action requested.	_	The state of the s	·L
i	Have taken or will take the action requested and claim it is subject to a grace period (attach despiled explanation).	56-57	Unable to report ultimate decision on the request at this tight will inform the Bureau of Trade Regulation of the decision tan days after decision is made.	
	ditional information: The firm submitting this report may if it so de	esires, state on a se	eparate sheet any additional information relating to the requ	est reported or

Additional information: The firm submitting this report may, if it so desires, state on a separate sheet any additional information relating to the request reported or the response to that request. This statement will constitute a part of the report and will be made available for public inspection and copying.

10. Unless indicated otherwise by checkmark in the box below, I (we) certify that disclosure to the public of the information regarding quantity, description, and value of the commodities or technical data contained in Item 11 below would place a United States person involved at a competitive disadvantage, and I (we) request that it be kept confidential. I (We) certify that all statements and information contained in this report are true and correct to the best of my (our) knowledge and belief.

Sign here in ink Fignature of person completing report)

9

Type or print <u>E.L. Buczkowski, Treasurer Date</u> 4/28/98

(Name and title of person whose signature eppears on line to left)

☐ I (We) authorize public release of all information contained in this report.

(Remove stub from public inspection copy at perforation if confidentiality is requested in Item 10)

Explanation in Connection With Items 8 And 9 On Form BXA-621P - No. 872077 Submitted April 30, 1998

Dover Resources, Inc.
Ronningen-Petter Division
9151 Shaver Road
PO Box 188
Portage, Michigan 49024-6798

On March 13, 1998, Ronningen-Petter received a fax from JGC Corporation, a Japanese company, requesting Ronningen-Petter to provide a statement of no use of Indian/Israeli supply sources in connection with the purchase of certain commodities under negotiation at that time. (See Attachment 1.) By letter dated March 19, 1998, Ronningen-Petter informed JGC Corporation that it could not legally respond to JGC Corporation's request for a statement of no use of Indian/Israeli supply sources. (See Attachment 2.) In response to Ronningen-Petter's March 19, 1998 letter, JGC Corporation, through its U.S. subsidiary JGC (USA), Inc., contacted Ronningen-Petter on March 24, 1998 and orally requested that Ronningen-Petter provide a statement that "the scope of supply does not include foreign parts." Ronningen-Petter provided a statement to that effect.

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PUBLIC INSPECTION COPY ATTACHMENT #1

3. Statement of no use of Indian/Israeli supply sources We need Vendor's confirmation on non-inclusion of such fabrication sources in Vendor's scope of supply.



PUBLIC INSPECTION COPY ATTACHMENT #2

9151 Shaver Road Portage, MI 49085 Phone: (616) 323-1313 Fax: (616) 323-2403

FAX TRANSMITTAL

March 19, 1998

To:

JGC Corporation, Japan

Fax:

011-81-45-682-8894

Attn.:

Mr. I. Mishina, Manager No. 2 Team

RE:

Inquiry No. E0-0800-215A-102 Dated Mar. 13, 1998

CC:

Ms. E. Brahn, JGC (USA), Inc.

Dear Mr. Mishina:

Under United States of America Law, Ronningen-Petter cannot legally respond to Item #3 of your fax of 13 March 1998, your ref # YP2/JUS-2444 regarding a statement of no use of Indian/Israeli supply sources. Please remove Item #3 in its entirety and resubmit your inquiry fax.

Please give us a call if you have any questions regarding these issues.

Sincerely,

Sean D. Ruth

Sales Application Specialist -

Refinery Systems